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November 9, 2022

VIA EMAIL (redacted version filed via ECF)

The Honorable Judge John G. Koeltl United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Hayes, et al., No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We respectfully submit this letter on behalf of Arthur Hayes pursuant to 18 U.S.C.
§ 3563(c) to request modification of the conditions of Mr. Hayes's probation
On May 20, 2022, the Court sentenced Mr. Hayes to
two years' probation, with a six-month term of home detention with electronic monitoring. See
ECF No. 344. Mr. Hayes's home detention will conclude on January 11, 2023. Mr. Hayes will
be subject to unsupervised probation thereafter, with permission to travel internationally, until
the conclusion of his sentence. <i>Id.</i>
Accordingly, we respectfully request that the Court permit Mr. Hayes to travel from
his current residence in Miami, Florida, to from December 20, 2022 to
December 27, 2022



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We also respectfully request that Mr. Hayes's electronic bracelet be permitted to be removed for the duration of his travel.
Mr. Hayes discussed his proposed travel and the temporary removal of his electronic bracelet with Probation Officer Harry Marcelin, who supervises Mr. Hayes in the Southern District of Florida. Officer Marcelin approved these requests, subject to the Court's order.
The government also consents to Mr. Hayes's requests.
The charges in this matter were unsealed on October 1, 2020. Mr. Hayes voluntarily surrendered to U.S. authorities thereafter, and the terms of his pretrial release conditions did not
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 $^2$  "PSR" refers to the Presentence Investigation Report dated May 10, 2022.  $\it See$  ECF No.

331. For reasons of personal privacy and security, we have redacted certain information from

the publicly-filed version of this letter.



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allow him to return The Earlie They did, however, allow him permission to reside in, and travel to and from, Singapore. <i>See</i> ECF No. 47. Mr. Hayes traveled to Singapore multiple time during the pretrial phase of this case, each time returning to the United States.	es
Mr. Hayes Will Return to Complete His Home Detention	
As noted in the Presentence Investigation Report, Mr. Hayes "is not viewed as a flight risk or danger to the community." PSR at 46. He was compliant with all aspects of his pretrial release, which allowed Mr. Hayes to travel to and from, and reside, in Singapore. <i>Id.</i> Mr. Hay made multiple trips between the United States and Singapore during the pendency of his pretriar release. <i>Id.</i> Since Mr. Hayes's sentencing, he has complied with all conditions of his probation Mr. Hayes has no reason to change course now when he is so close to the end of his home detention period.	es ıl
In sum, we respectfully request that the Court permit Mr. Hayes to travel from Miami, Florida without his electronic bracelet from December 20, 2022 to December 27, 2022.	,
We appreciate the Court's attention to this request.	
Respectfully Submitted,	
James Joseph Benjamin, Jr.	
cc: AUSAs Jessica Greenwood, Samuel Raymond, and Nathan Rehn (via email and ECF) USPO Harry Marcelin (via email)	